



ENVIRONMENTAL INFORMATION REPORT

NEWCHEM FACILITY

NEW CUMBERLAND, WEST VIRGINIA

ID NO. WVD074968413

CEC Project 110-108

February 13, 2012

Civil & Environmental Consultants, Inc.

Pittsburgh	333 Baldwin Road Pittsburgh, Pennsylvania 15205 Ph: 412/429-2324 – Fax: 412/429-2114 Toll Free: 800/365-2324 Email: pittsburgh@cecinc.com www.cecinc.com	Austin	855/365-2324	Cleveland	866/507-2324	Nashville	800/763-2326
		Boston	866/312-2024	Columbus	888/598-6808	North Central PA	877/389-1852
		Charlotte	704/773-6465	Detroit	866/380-2324	Phoenix	877/231-2324
		Chicago	887/963-6026	Export	800/899-3610	St. Louis	866/250-3679
		Cincinnati	800/759-5614	Indianapolis	877/746-0749		



Civil & Environmental Consultants, Inc. (CEC) has prepared this report to provide a synopsis of the historic and current issues associated with the occurrence of trichloroethylene (TCE) in the groundwater on the property south of the NewChem, Inc. (NewChem) facility located at 7743 Ohio River Boulevard, New Cumberland, West Virginia (Figure 1). This report has been prepared at the request of NewChem's legal counsel to facilitate dispute resolution concerning the Statement of Basis issued by the United States Environmental Protection Agency (USEPA) on August 25, 2011. It includes data collected since 2002, including information discovered in 2011.

NewChem has been performing a RCRA Facility Investigation (RFI) for their chemical processing plant in New Cumberland, West Virginia under the direction of the USEPA and the West Virginia Department of Environmental Protection (WVDEP), and under a RCRA 3008(h) Administrative Order on Consent for NewChem Incorporated on U.S. EPA Docket Number RCRA-03-2002-0010.

Groundwater samples collected during the RFI in February 2003 revealed the occurrence of TCE in three monitoring wells (MW-2/2A, MW-2D and MW-6D) located on the southwest corner of the NewChem property (see Figure 2 for well locations). Groundwater at this portion of the site occurs near bedrock at depths ranging from 53 to 83 feet below ground surface. Historic sampling of soils and groundwater had not previously detected the presence of TCE. Additional groundwater samples collected in March of 2003 confirmed the detections of TCE in the three onsite wells and also found TCE in two offsite wells (MW-A-2/MP7 and MW-C-1/MP6) located on MTR Gaming Group, Inc. (MTR) property to the south of NewChem. The concentration of TCE in offsite well MW-C-1/MP6 revealed the highest concentration of TCE of any of the wells sampled. As shown by the groundwater contour map on Figure 2, this well is hydraulically downgradient or sidegradient of the NewChem property with the groundwater flow direction



being primarily to the west. The higher TCE concentrations in the downgradient offsite well, as well as the lack of historic use, storage or detections of TCE at NewChem, raised the question of a possible offsite TCE source.

If the TCE source were located on the NewChem property it would be expected that the highest concentrations would be detected on the NewChem property with concentrations decreasing in the hydraulically downgradient direction (westward). An offsite source, located south of the Deltech property would migrate west with the groundwater gradient. A TCE groundwater plume of this nature would have its highest concentrations at its source and diminishing concentrations would be observed in the downgradient direction as the plume migrates westward with groundwater through advection and dispersion. Additionally, the plume will disperse laterally perpendicular to the direction of groundwater flow and yield lesser concentrations away from the centerline of flow from the source area. Therefore, a TCE source located on the property south of NewChem could account for TCE concentrations on the NewChem property as the plume migrated westward and dispersed to the north and south, with the lateral edge of the plume intersecting the southwestern corner of NewChem. The plume configuration does not support the conclusion of NewChem as the source.

To investigate the possibility of an offsite TCE source NewChem installed two additional wells MW-7 and MW-8 in 2003 and sampled the wells for the occurrence of TCE. Because NewChem could not gain access to the MTR property to install wells in the suspected source area, these two wells were installed on the NewChem property to further delineate the TCE plume. The results of this sampling revealed only minor concentrations of TCE on the NewChem property. The results of this sampling event as well as the March 2003 sampling event were used to develop a 2003 TCE iso-concentration map (Figure 2). This map shows the highest levels of TCE in groundwater occurring on the MTR property south of NewChem at well



MW-C-1/MP6, and concentrations decreasing in the upgradient or sidegradient direction toward the NewChem property. This plume configuration is not indicative of a TCE source on the NewChem property and suggests a possible offsite source.

To further investigate the occurrence of TCE on the MTR property to the south of the NewChem facility, NewChem researched the historic uses of the MTR property. WVDEP indicated that an asphalt plant may have operated on the MTR property at some point in the past. NewChem performed a file search with the WVDEP Department of Air Quality. The documents from WVDEP (Attachment 1) confirm that the property was formerly used as an asphalt batch plant from 1974 to 1986. These types of asphalt operations are known to have utilized TCE as a solvent in their QA/QC testing procedures until the early 1980's.

Sufficient evidence exists for the possibility of a TCE source on the MTR property to warrant further investigations on the MTR property. It was proposed that the conclusive source of the TCE plume could be determined by the installation of several additional monitoring wells on the MTR property. Three monitoring wells could be installed along an east-west line parallel to the MTR/Deltech property line and south of the MW-C-1/MP6 monitoring well that showed the highest TCE concentration. MTR has not consented to such a study. Sampling of these proposed wells as well as the existing offsite and NewChem wells in question should reveal enough of the TCE plume to more accurately determine its origin. Throughout the investigations in 2003, results of the TCE investigation were shared with both the USEPA and the WVDEP. Correspondence was also exchanged between Porter Wright, legal counsel for NewChem, and Mr. Matthew L. Wolford, Esq. legal counsel for MTR, however, permission to drill on the MTR property was not given.

The WVDEP commissioned Triad Engineering Inc. to collect another round of groundwater



samples in 2006 to further investigate the TCE impacted wells. Split samples were also collected by CEC on behalf of NewChem. Results of the 2006 sampling showed the same distribution of TCE in the offsite and onsite wells as was observed in 2003, however, there was a significant decrease in concentrations between 2003 and 2006. The results of the sampling as well as the 2003 results are shown on the table in Attachment 2. An isoconcentration map of the 2006 and 2003 TCE concentrations are also shown on Figure 2. The 2006 results confirmed the 2003 NewChem results and the decrease in concentrations from 2003 to 2006 were theorized to be from plume dispersion and/or natural degradation. Both the distribution and decrease in concentrations were consistent with the idea of an offsite discontinued source as was originally theorized in 2003 and no additional concerns were voiced by WVDEP.

Triad again collected samples in 2009/2010 on behalf of NewChem. Results of the 2009/2010 sampling again showed the same distribution of TCE in the offsite and onsite wells. The concentration data is also shown on the table in Attachment 2 as well as on the isoconcentration map (Figure 2). The results again showed another decrease in concentrations. The results of the 2009/2010 Triad sampling are also consistent with the original 2003 theory of an offsite and discontinued source as was communicated to the USEPA and the WVDEP. The statements by Triad made in their January 2010 report and again in their May 2010 report, indicating that the TCE is, *“due to an unknown source from the Site and is migrating off-site to the adjoining property to the west”* is not accurate and does not fully consider the historic sampling results, or the TCE distribution in relation to the groundwater flow direction. Triad never correlated any data since 2002 to create isopleths as are attached here.

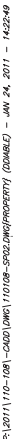
In 2011 an historic aerial photograph search was also performed to identify the asphalt plant location. Seven aerial photos (Attachment 3) ranging from 1954 to 2009 were found for the



subject area. The photo from 1982 clearly confirms the asphalt plant located just south of the NewChem facility along Route 2.

Based on the numerous lines of evidence presented above, TCE groundwater concentrations found on and near the southwestern portion of the NewChem property are presumptively from an offsite source. Given the current information the most probable source of the TCE is the historic asphalt plant located south of NewChem.

FIGURES



08\--CADD\DWG\110108-SP02.DWG\PROPERTY} (DOUBLE) - JAN 24, 2011 - 14:22:49



D	
C	
B	
A	



ALTA/ASCM LAND TITLE SURVEY, DATED JANUARY 2, 2002;
PREPARED BY TRI-STATE SURVEYING, INC.



GROUNDWATER CONDITIONS

THE WATER LEVELS PRESENTED HEREIN ARE APPLICABLE TO THE LOCATION AND TIME OF MEASUREMENT. WATER LEVELS MAY FLUCTUATE THROUGH TIME.


POTENTIOMETRIC CONTOURS GENERATED FROM THIS DATA ARE CONSTRUCTED BY INTERPOLATION BETWEEN THE KNOWN STATIC WATER LEVEL ELEVATIONS AND USING KNOWLEDGE OF SPECIFIC SITE CONDITIONS. ACTUAL STATIC WATER LEVELS AT LOCATIONS BETWEEN THE MONITORING POINTS MAY DIFFER FROM THOSE DEPICTED.

CHEMICAL CONDITIONS

CHEMICAL DATA PRESENTED HEREIN ARE APPLICABLE TO THE LOCATION, TIME OF SAMPLE COLLECTION, AND THE PARAMETERS ANALYZED. CHEMICAL CONDITIONS MAY CHANGE WITH TIME. REPORTED CONDITIONS MAY NOT REPRESENT CURRENT OR FUTURE CONDITIONS.

ISOCONCENTRATION CONTOURS GENERATED FROM THIS DATA ARE CONSTRUCTED BY INTERPOLATION BETWEEN POINTS OF MEASURED CONCENTRATION AND USING KNOWLEDGE OF SPECIFIC SITE CONDITIONS. CHEMICAL CONCENTRATIONS BETWEEN SAMPLING POINTS MAY DIFFER.

SCALE IN FEET



0 100 200



DRAWN BY:	DWD	CHECKED BY:	DRAFT	APPROVED BY:	DRAFT
DATE:	1/18/11	DWG SCALE:	1" = 100'	PROJECT NO:	110-108

2

ATTACHMENT 1
WVDEP DEPARTMENT OF AIR QUALITY DOCUMENTS

**NEWCHEM, INC.
RR2, BOX 3000
NEW CUMBERLAND, WV 26047**

**TELEPHONE 304 387-3554
FAX 304 387-3249**

May 14, 2003

Tom Walsh
CEC
333 Baldwin Road
Pittsburgh, PA 15205

Re: Tri-State Asphalt

Dear Tom:

I have enclosed the documents received from the WV DEP Department of Air Quality concerning the operation of the Tri-State Asphalt hot mix asphalt plant on the property adjacent to NewChem to the south. The earliest date mentioned is 1974 for plant operation and the last date mentioned was 1986. An application to relocate a newer plant in to the site was submitted in 1984 but the new plant was apparently never operated. The application indicated the property was leased from Standard Slag.

I also contacted the WV DEP Water and Waste Department but they were unable to locate any reference to Tri-State Asphalt.

Very truly yours,


Eugene R. Fluharty

MAY 15 2003

April 8, 1974

CERTIFIED MAIL

Mr. John H. Morgan
President
Tri-State Asphalt Corporation
East Jefferson Street
Martins Ferry, Ohio 43935

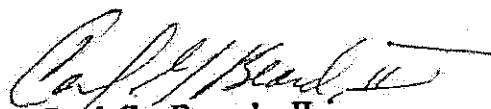
Dear Mr. Morgan:

On January 7, 1974, I wrote you concerning the 1974 Operating Permits for your asphalt hot mix plants located at Moundsville and Chester, West Virginia. These permits were not issued because the plants were not equipped to be in compliance with Regulation III - "To Prevent and Control Air Pollution From the Operation of Hot Mix Asphalt Plants".

I understand from Mr. Steve Smallwood, our Regional Engineer, that you have yet to meet with him concerning this matter on how these problems will be resolved. Until you can present this agency with evidence that your plants are equipped to operate in compliance with Regulation III, no operating permits will be issued and I can assure you that if you operate without a permit we will take appropriate legal action.

It would seem to me that a conference with you on this matter is rather urgent as the operating season is upon us.

Sincerely yours,


Carl G. Beard, II
Director

CGB/mfj

cc: Mr. Steve Smallwood
Regional Engineer
Northern Panhandle Regional Office

MEMORANDUM FOR RECORDS

TO: Steve Smallwood *JS*
Regional Engineer

DATE: October 29, 1976

FILE: Tri-State Asphalt

FROM: John Guzik
Associate Engineer

SUBJECT: Information concerning routine shutdown of Tri-State Asphalt
Company Plants.

On Monday, October 25, 1976, John Guzik contacted the Tri-State Asphalt Company concerning Plant shutdown for the rest of the year at the Arroya, Weirton, and Moundsville Plants.

Mr. Steve Gocsik, Plant Superintendent, was not at the office and returned the call on Tuesday, October 26, 1976, leaving the following information:

ARROYA - Was shutdown for the rest of the year as of the first week in September.

WEIRTON - Will shutdown in mid-December.

MOUNDSVILLE - Will shutdown the latter part of November.

John Guzik
Associate Engineer

JG/pod
cc: CG Beard, Director
Files



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
1558 Washington Street, East
CHARLESTON, WEST VIRGINIA 25311
TELEPHONE: 348-2275 OR 348-3286

December 15, 1975

Mr. Stephen E. Gocsik
Superintendent
Tri-State Asphalt Corporation
Box 6670
Martins Ferry, Ohio 43925

Dear Mr. Gocsik:

In accordance with Section 5 of Regulation III - "To Prevent and Control Air Pollution From the Operation of Hot Mix Asphalt Plants", enclosed is the 1977 Operating Permit(s) for your asphalt hot mix plant(s).

Please note that the permit(s) is issued subject to all the provisions of Regulation III and failure to operate and maintain the plant(s) in compliance with the regulation will result in the permit(s) being revoked.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Carl G. Beard, II", written over a horizontal line.

Carl G. Beard, II
Director

CGB/RME/bam
Enclosure(s)

STATE OF WEST VIRGINIA



AIR POLLUTION CONTROL COMMISSION

OPERATING PERMIT
ASPHALT HOT MIX PLANT

PERMIT NO. 1-77

THIS PERMIT IS ISSUED IN ACCORDANCE WITH CHAPTER 16,
ARTICLE 20, CODE OF WEST VIRGINIA, ADMINISTRATIVE REGULATIONS,
SERIES III, SECTION 5, AND IS SUBJECT TO THE CONDITIONS THEREOF.

Name of Company TRI-STATE ASPHALT CORPORATION

Mailing Address East Jefferson Street
Martins Ferry, Ohio 43935

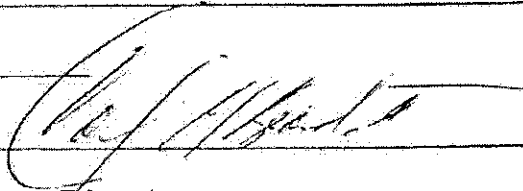
Type of Plant Permanent-Batch

County Hancock

Description of Location Route 2, South of Chester, West Virginia, one
mile south of Waterford Pack Track.

Remarks This permit is issued subject to an operating
inspection during 1977 operating season.

Expiration Date January 1, 1978

Issued By 

Title Director

Date January 1, 1977



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
1558 Washington Street, East
CHARLESTON, WEST VIRGINIA 25311
TELEPHONE: 348-2275 OR 348-3286

January 1, 1978

Mr. Orris W. Morgan
Executive Vice President
Tri-State Asphalt Corporation
East Jefferson Street
Martins Ferry, Ohio 43935

Dear Mr. Morgan:

In accordance with Section 5 of Regulation III - "To Prevent and Control Air Pollution From the Operation of Hot Mix Asphalt Plants," enclosed is the 1978 Operating Permit(s) for your asphalt hot mix plant(s).

Please note that the permit(s) is issued subject to all the provisions of Regulation III and failure to operate and maintain the plant(s) in compliance with the regulation will result in the permit(s) being revoked.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "C. G. Beard, II".

Carl G. Beard, II
Director

CGB, II/DES/nah

Enclosure(s)

STATE OF WEST VIRGINIA



AIR POLLUTION CONTROL COMMISSION

OPERATING PERMIT
ASPHALT HOT MIX PLANT

PERMIT NO. 1-78

THIS PERMIT IS ISSUED IN ACCORDANCE WITH CHAPTER 16,
ARTICLE 20, CODE OF WEST VIRGINIA, ADMINISTRATIVE REGULATIONS,
SERIES III, SECTION 5, AND IS SUBJECT TO THE CONDITIONS THEREOF.

Name of Company TRI-STATE ASPHALT CORPORATION

Mailing Address East Jefferson Street

Martins Ferry, Ohio 43935

Type of Plant Permanent-Batch

County Hancock

Description of Location Route 2, South of Chester, West Virginia, one
mile south of Waterford Rack Track.

Remarks This permit is issued subject to an operating
inspection during 1978 operating season.

Expiration Date January 1, 1979

Issued By *[Signature]*

Title Director

Date January 1, 1978



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
1558 Washington Street, East
CHARLESTON, WEST VIRGINIA 25311
TELEPHONE: 348-2275 OR 348-3286

January 1, 1979

Mr. Orris W. Morgan
Executive Vice President
Tri-State Asphalt Corporation
East Jefferson Street
Martins Ferry, Ohio 43935

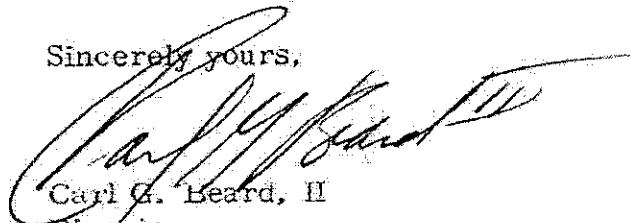
Permits #1-79,
#2-79 : #3-79

Dear Mr. Morgan:

In accordance with Section 5 of Regulation III - "To Prevent and Control Air Pollution From the Operation of Hot Mix Asphalt Plants," enclosed is the 1979 Operating Permit(s) for your asphalt hot mix plant(s).

Please note that the permit(s) is issued subject to all the provisions of Regulation III and failure to operate and maintain the plant(s) in compliance with the regulation will result in the permit(s) being revoked.

Sincerely yours,



Carl G. Beard, II
Director

CGB, II/YP/nah

Enclosure(s)

STATE OF WEST VIRGINIA



AIR POLLUTION CONTROL COMMISSION

OPERATING PERMIT
ASPHALT HOT MIX PLANT

PERMIT NO. 1-79

THIS PERMIT IS ISSUED IN ACCORDANCE WITH CHAPTER 16,
ARTICLE 20, CODE OF WEST VIRGINIA, ADMINISTRATIVE REGULATIONS,
SERIES III, SECTION 5, AND IS SUBJECT TO THE CONDITIONS THEREOF.

Name of Company TRI-STATE ASPHALT CORPORATION

Mailing Address East Jefferson Street

Martins Ferry, Ohio 43935

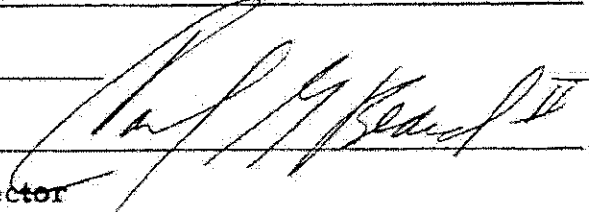
Type of Plant Permanent-Batch

County Hancock

Description of Location Route 2, South of Chester, West Virginia, one mile
south of Waterford Rack Track

Remarks This permit is issued subject to an operating
inspection during the 1979 operating season.

Expiration Date January 1, 1980

Issued By 

Title Director

Date January 1, 1979



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
NORTHERN PANHANDLE REGIONAL OFFICE
1911 Warwood Avenue
WHEELING, WEST VIRGINIA 26003
Telephone: 304-277-2662

MEMORANDUM FOR RECORD

TO: NPRO File DATE: February 6, 1980

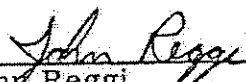
FROM: John Reggi
Regional Engineer

SUBJECT: TRI-STATE ASPHALT

FILE: Tri-State Asphalt
Reg. III All Plants

On February 4, 1980 I contacted Mr. Steve Gocsik, environmental spokesman for Tri-State Asphalt and informed him of a recent change in W. Va. APCC Regulation III. I also mentioned that during the up coming operating year he would be receiving a request from this agency to perform stack test on one or all of his W. Va. plants to prove compliance with the new regulation. I discussed with him the rumor that the Moundsville plant would be relocated and learned that the company will operate in Moundsville at least one more year.

Mr. Gocsik requested a copy of the new regulation which will be supplied by this office.



John Reggi
Regional Engineer

JR/mlc

cc: Carl G. Beard, II
Director



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
1558 Washington Street, East
CHARLESTON, WEST VIRGINIA 25311
TELEPHONE: 348-2275 OR 348-3286

March 14, 1980

CERTIFIED MAIL

Mr. Robert J. Mulroy
President
Tri-State Asphalt Corporation
East Jefferson Street
Martins Ferry, Ohio 45735

Dear Mr. Mulroy:

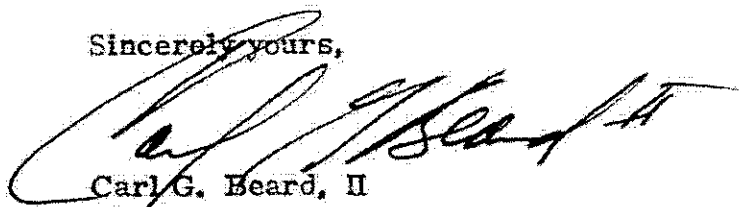
A review of this agency's files concerning your three asphalt plants located in Chester, Weirton, and Moundsville, West Virginia reveals that each of these plants utilizes a low energy wet scrubber for the control of particulate emissions. Based on this agency's inspection of your plants and new stationary sources background information, it is our opinion that the emissions from these plants exceed the weight emission limits as set forth in this agency's Regulation III.

Therefore, as authorized by the West Virginia Air Pollution Control Commission and sub-section 7.01 of Regulation III, you are hereby ordered to submit to this agency a compliance program for each of these plants within the next 60 days. These schedules must include the following:

- (1) dates when contracts will be let for the purchase of control equipment;
- (2) dates by which installation control equipment will begin;
- (3) dates by which installation of equipment will be completed;
- (4) date of compliance with Regulation III.

If you have stack sampling data which shows these plants to be in compliance with these Regulation III emission requirements, then promptly contact the undersigned. If you have any other questions concerning this matter, please promptly call me.

Sincerely yours,



Carl G. Beard, II
Director

CGB:kr

(cont'd)

Mr. Robert J. Mulroy

March 24, 1980

Page Two

cc: Honorable Don R. Richardson
Chairman, Air Pollution Control Commission

Honorable Crede D. Douglass
Vice-Chairman, Air Pollution Control Commission

All Members
Air Pollution Control Commission

Mr. John Reggi
Regional Engineer
Northern Panhandle Regional Office
Air Pollution Control Commission

TRI-STATE ASPHALT CORPORATION

RECEIVED

1980 APR 28 PM 12:15

Road and Street Resurfacing Materials

EAST JEFFERSON STREET — P.O. BOX 160

MARTINS FERRY, OHIO 43935



Martins Ferry, Ohio
614-633-2331

Wheeling Phones:
304-232-4242

Plants:
AIR POLLUTION
CONTROL COMMISSION
Bellaire, Ohio
Mingo Junction, Ohio
Arroyo, W.Va.
Moundsville, W.Va.
Wheeling, W.Va.
Weirton, W.Va.
Also
Modern Portable Plants

April 25, 1980

Mr. Carl G. Beard II, Director
West Virginia Air Pollution Control Commission
1558 Washington Street, East
Charleston, WV 25311

Dear Sir:

In reply to your letter of March 24, 1980 and as a result of the meeting held in your office on April 3, 1980, we are submitting the following information for our three asphalt plants located at Moundsville, Weirton and Arroyo, West Virginia for your consideration.

MOUNDSVILLE PLANT

This plant is scheduled to be replaced by a new Barber-Greene Drum Mix Plant at the end of the 1980 operating season which generally ends the latter part of November. A deposit of \$20,000. has been made on this plant to insure delivery (copy attached). The present plant is to be torn down in mid-December of 1980 and erection of the new plant is scheduled to begin May 1, 1981. This new plant will incorporate the latest and best technology and equipment available and will be in compliance with Regulation III.

During the 1980 operating season, it is projected that production from this plant will be very minimal. A 20 to 30 day schedule is anticipated at this time.

To enable us to keep our emissions at a minimum, the following work is scheduled to begin June 2, 1980:

1. Replacement of pugmill housing dust seal - - - \$1,250.00
2. Scavenger dust piping from the pugmill, shaker screen, and hot elevator shall be cleaned, repaired, or replaced - - - \$3,100.00
3. Repair dust seal at the discharge end of the drier - - - - - 750.00

- | | | |
|--|-----------|------------|
| 4. Replace worn cones and vanes in the Multi-Clone Primary Collector | - - - - - | \$2,700.00 |
| 5. Replace worn piping and spray nozzles in wetting chamber and wet washer | - - - - | \$1,100.00 |
| 6. Install new impeller in wet wash system water pump | - - - - - | \$ 600.00 |

Total Expenditures \$9,500.00

The above items are scheduled for completion by July 7, 1980.

WEIRTON PLANT

This plant is scheduled for replacement at the end of the 1981 operating season which ends in mid-December. Plans are now for tearing down of the plant at that time and for erection of a new plant to begin May 1, 1982. The new plant shall also incorporate the latest and best technology and equipment available and will also be in compliance with Regulation III.

During March and April of this year the following work was done on this plant to minimize emissions:

- | | | |
|--|-----------|-------------|
| 1. Installation of a new Shaker Screen including dust housing | - - - - - | \$25,000.00 |
| 2. Installation of new dust duct from Cyclone Primary Dust Collector to the Exhaust Fan | - - - - - | \$12,500.00 |
| 3. Installation of a new cone on Cyclone Primary Collector | - - - - - | \$ 1,800.00 |
| 4. Installation of internal scavenger dust ducts on inside of plant tower from weigh hopper, hot bins and shaker screen to Cyclone Primary Collector | | \$ 4,800.00 |
| 5. Installed new scavenger duct from hot elevator to Cyclone Primary Collector | - - | \$ 850.00 |
| 6. Installed new internal spin vanes, spray pipes and nozzles in Wet Tube Washers | - - - - - | \$ 2,300.00 |

Total Expenditures for March, April 1980 \$47,250.00

ARROYO PLANT

It is presently our intention to keep this plant operational for several years. The production from this plant has never been high, seldom exceeding 50 or 60 days a year, being mainly a back-up unit for our other plants.

In 1974, at your request, we installed an automatic fuel oil burner on our drier to overcome periods of smoke caused by manual operation of the burner controls. Since that time we feel that our emissions have largely been under control.

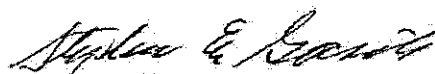
To maintain this standard we have scheduled the following work on the control equipment to begin May 12 and conclude June 13.

- | | |
|--|------------|
| 1. Installation of new dust seals around the pugmill and shaker screen housings | \$1,500.00 |
| 2. Enlargement of the scavenger dust pipe from the pugmill, shaker screen and hot elevator to provide a better air flow into the Cyclone Collector | \$4,500.00 |
| 3. Replacement of a large worn area in the housing of the Cyclone Collector | \$3,200.00 |
| Total Expenditures | \$9,200.00 |

Please contact me if further information is needed.

Sincerely yours,

TRI-STATE ASPHALT CORPORATION



Stephen E. Gocsik
Supt. of Plants

SEG:mlz

Attachment

[illegible]

227

P.O. BOX 507
NEW PHILADELPHIA, OHIO 44663

PAID

MARCH 20 19 80 69-322
434

PAY TO THE ORDER OF THE MCLEAN COMPANY

\$ 20,000.00

26 APR 1965 15200000

DOLLARS

西
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西

first west virginia bank n.a.
WARWOOD WHEELING, W.VA. 26003

1.1.1.1

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WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
1558 Washington Street, East
CHARLESTON, WEST VIRGINIA 25311
TELEPHONE: 348-2275 OR 348-3286

May 5, 1980

Mr. Glenn Straub
Owner
Tri-State Asphalt Corporation
East Jefferson Street
P. O. Box 160
Martins Ferry, Ohio 43935

Dear Mr. Straub:

By copy of this letter, we are sending temporary operating permits for your asphalt plants located in the Northern Panhandle to Mr. Stephen E. Gocsik, Superintendent of Plants. These permits are temporary because the emissions from these plants are in excess of the emission limitations contained in amended Regulation III of this agency.

I have reviewed Mr. Gocsik's letter of April 25, 1980, and want to call your attention to Section 7 of Regulation III and 16-20-5(17) of the Code of West Virginia which requires that plans for compliance be entered into a Consent Order.

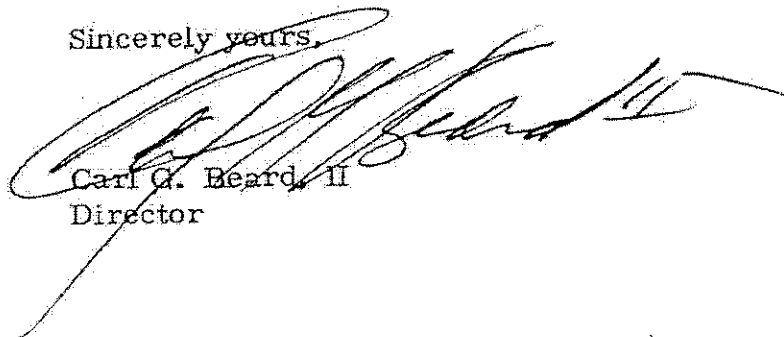
I note from Mr. Gocsik's letter that you will replace your Moundsville plant with a new plant, properly controlled, no later than January 1, 1981, and that you will also take certain actions to reduce emissions and that such actions would be taken on or before July 7, 1980. By now you should have completed the maintenance work outlined in Mr. Gocsik's letter on your Weirton plant and this plant will be inspected by our Compliance personnel very shortly. We may require you to have a stack test conducted because, from my information, this is your largest production facility.

WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION

Mr. Glenn Straub
Page Two
May 5, 1980

The discussion regarding your Arroyo plant is completely unsatisfactory. According to Mr. Gocsik's letter, some minor maintenance work will be performed on the Arroyo plant beginning on May 12 and will be concluded by June 13; however, this gives us no assurance that this plant will meet the emission requirements of Regulation III, as amended. Therefore, I am requesting that you review this matter and provide a schedule on how the plant will be brought into compliance. This schedule should be supplied as soon as possible but not later than 5-19-80. If you should have any questions, please contact this office.

Sincerely yours,



Carl G. Beard, II
Director

CGB, II/nah

cc: Mr. Samuel Kusic
Commissioner, WVAPCC

Mr. John Reggi
Regional Engineer
Northern Panhandle Regional Office

Mr. Stephen E. Gocsik
Superintendent of Plants
Tri-State Asphalt Corporation

Mr. Robert Gorby
W. Va. Department of Highways

TRI-STATE ASPHALT CORPORATION

Road and Street Resurfacing Materials
EAST JEFFERSON STREET — P. O. BOX 160
MARTINS FERRY, OHIO 43985

Plants:
Mingo Junction, Ohio
Wheeling, W. Va.
Weirton, W. Va.
Also
Modern Portable Plants



Martins Ferry Phone:
614-633-2331
Wheeling Phone:
304-222-4242

May 28, 1980

Mr. Carl G. Beard II, Director
West Virginia Air Pollution Control Commission
1558 Washington Street, East
Charleston, West Virginia 25311

Dear Mr. Beard:

Following are plans for compliance programs for each of our three asphalt plants as required under Section 7 of Regulation III and 16-20-5 (17) of the Code of West Virginia:

MOUNDSVILLE PLANT:

1. Preliminary adjustments to present control equipment will begin June 2, 1980 and will be completed July 7, 1980. This plant will shut down before December 15, 1980 and will never run again.
2. On March 20, 1980 a deposit of \$20,000.00 was made toward the purchase of a new plant. New plant will be available for production by February 1, 1981 and will meet Regulation III Emission requirements.

WEIRTON PLANT:

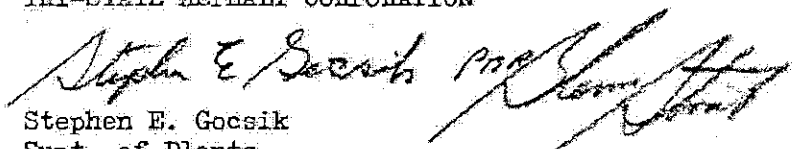
1. Scheduled repairs and maintenance have been completed during March, April and May of this year.
2. A contract was let in February 1980 for a new sound silencer to be installed by June 10, 1980.
3. This plant will shut down before December 15, 1981, and will never run again.
4. A contract will be let for a new plant by December 15, 1981.
5. Delivery of the new plant is to be made before March 31, 1982.
6. Construction will be completed and plant will be in operation by May 15, 1982 and will meet Regulation III Emission requirements.

ARROYO PLANT:

1. Plant will not run after December 15, 1981 until a baghouse is installed which will meet Regulation III Emission requirements.
2. Our Arroyo Plant is small, but is our cleanest plant on emissions. One reason for this is because this plant uses natural sand and gravel and not steel slag. The other reason is this plant only runs for very short terms with low capacity. So after our early summer maintenance program, this plant should be as good as new. With our high capital costs on other asphalt plants over the next year and a half, it makes it impossible to install the baghouse until December 15, 1981.

Sincerely yours,

TRI-STATE ASPHALT CORPORATION


Stephen E. Gocsik
Supt. of Plants

SEG:ar



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
NORTHERN PANHANDLE REGIONAL OFFICE
1911 Warwood Avenue
WHEELING, WEST VIRGINIA 26003
Telephone: 304-277-2662

MEMORANDUM FOR RECORD

TO: John Reggi
Regional Engineer

DATE: August 15, 1980

FROM: Judith Tredway
Air Pollution Specialist

SUBJECT: TRI-STATE ASPHALT - ARROYO PLANT
General Inspection

FILE: Tri-State Asphalt
Arroyo Plant - Regulation III

On Tuesday, August 12, 1980 Debbie Peters and I conducted a General Inspection of the subject facility. We contacted and were accompanied on the inspection by the plant superintendent, Mr. James Vargo.

Background

Prior to issuance of the 1980 Operating Permits for the Tri-State Asphalt Moundsville, Weirton, and Arroyo Plants, the company was requested to submit compliance programs designed to render these plants compliant with amended Regulation III. Plans to reconstruct or modify these facilities, as outlined in a letter from the company dated April 25, 1980, did not assure that Regulation III emission requirements would be satisfied; particularly questionable were modifications scheduled for the Arroyo Plant. Therefore, the permits were issued on a "temporary" basis pending determination and attainment of compliant status.

Inspection 8/12/80

The following information and observations were obtained or made during the subject inspection:

- (1) Operation of the plant this season has been and will continue to be sporadic, as is usually the case since it is maintained primarily as a back-up facility.

WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION

Tri-State Asphalt - Arroyo Plant
August 15, 1980
Page Two

- (2) Fuel for the Drum Dryer is #2 grade fuel oil and normal operating temperature is between 285° and 300°F. However, the plant was being operated at a higher temperature (320° - 340°F) at the time of inspection - explained as necessary to compensate for excessive moisture in the aggregate resulting from heavy rainfall the preceeding day and night.
- (3) As confirmed by the Registration document, pressure drop across the wet scrubber has never been ascertained.
- (4) Only fresh water is supplied to the wet scrubber with no provision for clarification and recirculation. Waste water is conducted via above ground pipeline to a single lagoon or settling pond, where sediment is removed periodically and hauled away to be used primarily for ground fill.
- (5) Access roads are compacted dirt and slag and appeared to be fairly well maintained. It is noted, however, that due to considerable rainfall the previous night, the area was well wetted down making it difficult to determine dust potential under dry conditions.
- (6) Stockpiles are well contained and appear not to be a significant source of dust.
- (7) Vibrating screens - a considerable amount of dust was observed emanating continually from the vibrating screens. Screen housing appears to terminate at or near screen level rather than extending to partially contain emissions. The duct breaching the screen housing to the primary cyclone is only approximately 6" in diameter and apparently is not adequate to serve the volume of dust generated at this point.
- (8) Scrubber stack emissions, observed initially upon arrival at the plant, were dark tan in color, a condition that appeared to be attributable to rather dense particulate, as evidenced by fall-out occurring in close proximity of the stack and the absence of any appreciable trail-off beyond the point of steam dissipation - suggesting, perhaps, the escape to atmosphere of material normally removed by the primary cyclone. That "condition" improved gradually over a period of approximately 20 minutes. Pursuant to completing the physical inspection,

WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION

West State Asphalt - Arroyo Plant

August 15, 1980

Page Three

the stack was observed from vantage points both north and south of the plant for periods aggregating over 10 minutes. During that time stack emissions appeared to be wholly steam with no discoloration or trail-off evident, and, therefore, no Visible Emissions readings were obtained.

- (9) We observed as the first truck of the day was loaded, and from a vantage point approximately 20-25 feet downwind, no objectionable emissions or odors were detected. It is noted, however, that the loaded material was not covered to prevent possible odor emissions during transport.
- (10) All remaining process and control equipment along with attendant duct work was inspected with no leakage of smoke, dust, material, or odor noted.

Conclusions

In the opinion of the inspectors, the subject plant exhibited non-compliant operation on the date of inspection.

As observed and described above, emissions from the scrubber stack appeared to be in violation of Section 2., Sub-section 2.01 of Regulation III. Mr. Vargo indicated that start-up had occurred shortly before our arrival or within approximately one (1) hour. Although the stack did eventually "clear" to compliant status, opacity of emissions were estimated to be well above 20% for a period of observation aggregating no less than fifteen (15) minutes. It is suggested that the increased operating temperature may have been partially responsible for the excess emissions and the apparent density of the particulate would indicate inefficient operation of the primary cyclone collector.

Excessive dust emanating from the vibrating screens was adjudged in violation of Section 3., Sub-section 3.05 of Regulation III and appeared to be attributable to a three-fold problem: (1) the screens were very likely worn and in need of changing; (2) the screen housing is not of sufficient height to help contain emissions; (3) the dust duct breaching the screen housing to the primary cyclone collector is too small to allow sufficient air flow for capturing the volume of dust emitted.

WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION

Tri-State Asphalt - Arroyo Plant
August 15, 1980
Page Four

It is understood that a compliance schedule for the Arroyo plant has been ordered by the Director - pursuant to assessing the modifications proposed in the aforementioned April 25, 1980 communication inadequate and unacceptable. It is noted here that there was no evidence that these originally proposed modifications were performed as an interim measure, although completion of same was stated to be scheduled for June 13, 1980.

Based on the findings of the subject inspection, it is recommended that Notice of Violation be issued promptly.


Judith Tredway
Air Pollution Specialist


Debbie Peters
Air Pollution Specialist

JT/gag

cc: C. G. Beard, II

TRI-STATE ASPHALT CORPORATION

Road and Street Resurfacing Materials
EAST JEFFERSON STREET — P. O. BOX 160
MARTINS FERRY, OHIO 43935

Plants:

Mingo Junction, Ohio

Wheeling, W. Va.

Weirton, W. Va.

Also:

Modern Portable Plants



Martins Ferry Phone:

614-633-2331

Wheeling Phone:

304-232-4242

May 28, 1980

Mr. Carl G. Beard II, Director
West Virginia Air Pollution Control Commission
1558 Washington Street, East
Charleston, West Virginia 25311

Dear Mr. Beard:

Following are plans for compliance programs for each of our three asphalt plants as required under Section 7 of Regulation III and 16-20-5 (17) of the Code of West Virginia:

MOUNDSVILLE PLANT:

1. Preliminary adjustments to present control equipment will begin June 2, 1980 and will be completed July 7, 1980. This plant will shut down before December 15, 1980 and will never run again.
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1. Scheduled repairs and maintenance have been completed during March, April and May of this year.
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5. Delivery of the new plant is to be made before March 31, 1982.
6. Construction will be completed and plant will be in operation by May 15, 1982 and will meet Regulation III Emission requirements.

WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION

Tri-State Asphalt
Arroyo Plant
September 19, 1980
Page Two

A closer inspection of the vibrating screen assembly had revealed that the dust leakage originated at a joint where the vertical housing is bolted to the hopper bins. I likewise brought this condition to Mr. Vargos' attention and indicated it should be corrected as soon as possible. Mr. Vargo advised that such maintenance had already been scheduled for the following week (September 22-26).

Pursuant to the discussion with Mr. Vargo, I obtained a series of opacity readings of the scrubber stack emissions, a record of which is attached to this memo. Over a twenty (20) minute period of observation the opacity ranged from 5% to 50%, substantiating violation of Section 2., Sub-section 2.01, Regulation III. It is noted that during this observation, steam ratio of the effluent fluctuated significantly.

It is not recommended at this time to issue a Notice of Violation based on the findings of this inspection due to (1) admitted equipment failure contributing largely to excessive scrubber stack emissions and (2) a previous recommendation for dealing with non-compliant operation at all Tri-State installations in Region I, outlined in a memo dated September 17, 1980, Subject - Tri-State Asphalt, Weirton Plant, Excessive Smoke and Dust Emissions.


Judith L. Tredway
Air Pollution Specialist

JLT/gag

Attachment

cc: C.G. Beard, II



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
NORTHERN PANHANDLE REGIONAL OFFICE
1911 Worwood Avenue
WHEELING, WEST VIRGINIA 26003
Telephone: 304-277-2682

MEMORANDUM FOR RECORD

TO: John Reggi
Regional Engineer

DATE: September 19, 1980

FROM: Judith Tredway
Air Pollution Specialist

SUBJECT: TRI-STATE ASPHALT
Arroyo Plant - Excessive Emissions

FILE: Tri-State Asphalt
Arroyo Plant - Reg. III

On Tuesday, September 16, 1980 Debbie Peters and I were enroute to Chester, WV to investigate a complaint originated in that city. and as we passed the subject facility at approximately 10:20 A. M., excessive emissions were observed emanating from the scrubber stack. The resulting plume was dark tan in color and there was an obvious lack of any appreciable amount of steam. Considering the possibility the plant was in start-up status, we proceeded on to the primary destination with the intent to further observe the Asphalt Plant on the return trip.

We arrived back at the Plant site at approximately 11:10 A. M. and found that the scrubber stack emissions were essentially as they had been 40 minutes earlier, discounting the possibility the condition was due to start-up. While attempting to find a position suitable for taking opacity readings, profuse leakage of dust was noted around the area of the vibrating screens. Also during this time, steam content in the scrubber stack effluent was noted to increase significantly.

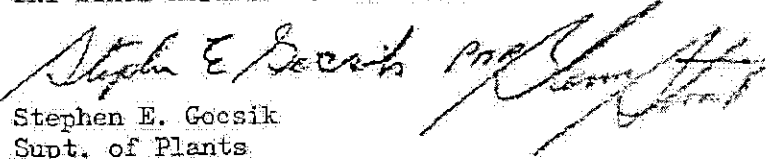
I decided at that point to enter the Plant and talk with the Superintendent, Mr. James Vargo, concerning our observations. Mr. Vargo was located at approximately 11:15 A. M. at the field office control room and I questioned him first relative to the scrubber stack emissions. He advised that water pressure to the scrubber was lost that morning due to a pump malfunction, but they had just completed the necessary repairs which he felt would restore proper operation.

ARROYO PLANT:

1. Plant will not run after December 15, 1981 until a baghouse is installed which will meet Regulation III Emission requirements.
2. Our Arroyo Plant is small, but is our cleanest plant on emissions. One reason for this is because this plant uses natural sand and gravel and not steel slag. The other reason is this plant only runs for very short terms with low capacity. So after our early summer maintenance program, this plant should be as good as new. With our high capital costs on other asphalt plants over the next year and a half, it makes it impossible to install the baghouse until December 15, 1981.

Sincerely yours,

TRI-STATE ASPHALT CORPORATION


Stephen E. Gocsik
Supt. of Plants

SEG:ar

VISIBLE EMISSIONS TEST SERIES

Company: Tel-Avive Asphalt

Plant: A32240

City: Newman, Georgia

County: HANCOCK

AQCA

Date: 4/15/82

Time: Start: 1142 AM

Stop: 11143

Reason for Readings: Determine Compliance[illegible]

§ 100.000-100.000

10



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
1558 Washington Street, East
CHARLESTON, WEST VIRGINIA 25311
TELEPHONE: 346-2275 OR 346-3265

March 24, 1981

Mr. Stephen B. Cocsik
Superintendent of Plants
Tri-State Asphalt Corporation
East Jefferson Street
P. O. Box 168
Martins Ferry, Ohio 43935


Dear Mr. Cocsik:

Subject: Arroyo Plant

Per your letter dated May 28, 1980, your commitment to shut down your Arroyo plant after December 15, 1981, until fabric filtration equipment is installed, will be drawn up in a Consent Order for the Commission's review. Upon acceptance of the aforementioned Consent Order, a 1981 operating permit will be issued for the Arroyo plant. Such a Consent Order, if entered into by the Commission, would not relieve your company from operating and maintaining this plant until December 15, 1981, in a manner as to minimize air pollution emissions, including fugitive-type emissions.

If you have any questions concerning the above, please feel free to contact me.

Sincerely, yours,


Carl G. Beard, II
Director

CCB,II:RLW:rah

cc: Mr. John Reggi
Regional Engineer
WVAPCC, Northern Panhandle Regional Office



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
NORTHERN PANHANDLE REGIONAL OFFICE
1911 Worwood Avenue
WHEELING, WEST VIRGINIA 26003
Telephone: 304-277-2662

MEMORANDUM FOR RECORD

TO: John Reggi
Regional Engineer

DATE: July 22, 1981

FROM: Judith Tredway
Air Pollution Specialist

SUBJECT: TRI-STATE ASPHALT - ARROYO PLANT
General Inspection

FILE: Tri-State Asphalt
Arroyo Plant
Regulation III

Background

On Thursday, July 16, 1981, while in the area on unrelated business, Carl G. Beard, II and John Reggi noted extremely excessive emissions of dust and smoke emanating from the subject facility and entered the Plant to make a closer inspection.

This Plant employees a wet scrubbing device to control particulate emissions which, when operating properly, causes a significant volume of steam to be emitted from the exhaust stack due to the high temperature of the exhaust gases. At the time, Mr. Reggi described the voluminous stack effluent as being dark brown in color and completely devoid of steam, indicating that (1) the scrubber was not being operated properly (i. e. insufficient water volume/pressure), (2) spray nozzles were plugged, (3) scrubber was not being utilized at all. Large volumes of smoke/dust were also emanating from the vibrating screens and mixing bin.

The Inspection Party spoke with the Plant operator, Mr. Greg Borosh, who was unable to offer an explanation for the deplorable operating conditions. Mr. Beard advised Mr. Borosh that he would be given 24 hours to make repairs/adjustments necessary to bring the Plant into a reasonable state of compliance and failure to do so would result in initiation of procedures to have the Plant shut down.

WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION

Tri-State Asphalt
Arroyo Plant
July 22, 1981
Page Two

Debbie Peters and Judy Tredway were instructed to inspect the facility the next afternoon (Friday, July 17) and determine compliance with the verbal order and degree of regulatory compliance achieved. However, when Ms. Peters and Ms. Tredway arrived at the Plant, it was not operating, the entry gate was locked, and no personnel were on the site.

Follow-Up Inspection

On Tuesday, July 21, 1981 Debbie Peters and Judy Tredway conducted the necessary follow-up inspection. We arrived at approximately 10:30 AM and talked with Mr. Borosh who advised that the Plant was down temporarily due to a thunderstorm occurring at the destination point, but would re-start as soon as conditions permitted.

Mr. Borosh advised that pursuant to Messrs. Beard and Reggi's inspection, it was discovered that the mechanical collector ahead of the scrubber was completely plugged up. He showed us a chunk of concrete-like material (approx. 7" x 7" x $\frac{1}{4}$ ") that apparently lodged in the cyclone discharge end and, it is speculated, initiated the plugging which eventually allowed a large quantity of fines to build up inside the collector. Ordinarily, effluent from the cyclone discharges continually back into and is recirculated thru the system. We also observed the large quantity of fine dirt that had been manually removed from the cyclone collector.

After completing other inspection activities in the area, Ms. Peters and Ms. Tredway returned to the subject Plant at approximately 2 PM and found it operating.

At that time, although there was a significant volume of steam present, the stack effluent was brownish in color and a brownish trail-off persisted for approximately 100 yards beyond steam dissipation. Opacity of the trail-off at the nearest point of steam dissipation was estimated to fluctuate from 15% to 35%. However, the sky was heavily overcast on this day, and it was not possible to obtain an accurate set of visible emission readings.

Dust/smoke were emanating profusely from the vibrating screen and mixing bin housings. Emissions from these sources were sufficient in volume to be picked up by and intermix with the Scrubber stack plume, causing further difficulty in accurately determining opacity of plume trail-off.

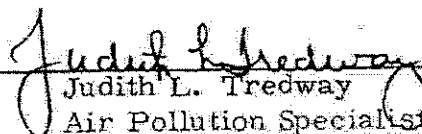
WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION

Tri-State Asphalt
Arroyo Plant
July 22, 1981
Page Three

We again spoke with Mr. Borosh and determined that the production rate was 90 tons per hour at 300°F. (Design capacity for this Plant according to the registration is 120 tons/hour.) We also advised him of the above observations. Mr. Borosh noted that an attempt had been made to tighten/patch the joints in the screen and mixing bin housings, but due to corrosion and "warping" of the metal leakage of dust, could not be totally eliminated.

Although the Arroyo Plant did not demonstrate compliant operation at this inspection, there was evidence that attempts had been made to improve operating conditions and lessen emissions. There was a greater volume of steam present in the scrubber stack plume than at any time witnessed by these inspectors last season. Due to the age and state of deterioration of equipment, it is suggested that compliant operation will be achieved only by replacement or major renovation.

In the interim, it appears that routine maintenance and improved operating practices would certainly serve to minimize emissions, and additional inspections will be conducted to assure such efforts are being made.


Judith L. Tredway
Air Pollution Specialist

JLT/gag

cc: C.G. Beard, II



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
NORTHERN PANHANDLE REGIONAL OFFICE
1911 Worwood Avenue
WHEELING, WEST VIRGINIA 26003
Telephone: 304-277-2662

MEMORANDUM FOR RECORD

TO: John Reggi
Regional Engineer

DATE: July 24, 1981

FROM: Judith Tredway
Air Pollution Specialist

SUBJECT: TRI-STATE ASPHALT - ARROYO
Compliance Inspection

FILE: Tri-State Asphalt
Arroyo Plant - Reg. III

On Thursday, July 23, 1981 Debbie Peters and Judy Tredway inspected the subject facility to determine general compliance status.

The attached Visible Emission readings were made between 10:00 AM and 10:45 AM during which time the stated production rate was 95 tons per hour. During sequential 16-minute periods of observation the opacity of scrubber stack trail-off emissions ranged from 0 to 15% at the point of steam dissipation and the opacity of smoke/dust emanating from the vibrating screen housing ranged from 15% to 60%. VE readings of emissions from the vibrating screens were taken to provide an indication of the severity of leakage at that point.

It is noted that this is the "cleanest" stack this Plant has exhibited during inspections or casual observation over the last two (2) years. Although it is known that extensive rehabilitation will be required to bring this Plant into total compliance, it is suggested that, in the interim, with a little conscientious effort a much cleaner operation than has prevailed in the past is possible.

Mr. Beard has verbally given Mr. Straub permission to continue operating the Arroyo Plant for approximately three (3) weeks to fulfill a highway contract commitment with the state of Ohio before

WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION

Tri-State Asphalt - Arroyo

July 24, 1981

Page Two

shutting the facility down for repair with the understanding that every effort will be made to minimize emissions. Surveillance will be maintained during this time to assure that such efforts are being continued.


Judith L. Tredway
Air Pollution Specialist

JLT/gag

Attachment

cc: C.G. Beard, II

VISIBLE EMISSIONS TEST SHEET

Company: Tri-State Air Plant: Arroyo

City: Newell (Arroyo) County: Hanover AQCR: I

Date: July 27 1971 Time: Start: 10:00 AM Stop: 10:44 AM

Reason for Readings: Discharge into stream

Source Desig. V.H. Source						Source Desig. South Side						Source Desig.					
Time		Ringelmann #				Time		Ringelmann #				Time		Ringelmann #			
		% Opacity						% Opacity						% Opacity			
		Seconds						Seconds						Seconds			
Hr	Min	0	15	30	45	Hr	Min	0	15	30	45	Hr	Min	0	15	30	45
12	00	65	55	55	55	10	00	5	0	5	10						
	05	50	40	60	60		05	5	10	15	10						
	10	40	50	40	45		10	5	5	5	5						
	15	25	20	30	30		15	5	10	0	5						
	20	25	25	25	20		20	5	10	1	5						
	25	—	—	20	35		25	5	5	5	5						
	30	10	30	30	20		30	5	5	2	0						
	35	30	25	20	25		35	0	0	0	10						
	40	35	25	25	20		40	5	5	10	5						
	45	25	15	20	40		45	10	5	5	5						
	50	35	20	20	20		50	5	10	10	5						
	55	25	20	20	15		55	0	0	5	5						
	00	30	25	30	—		00	15	10	10	5						
	05	20	20	25	20		05	40	10	5	5						
	10	25	25	20	35		10	5	20	15	10						
	15	25	35	15	15		15	10	0	5	10						

Observer: James P. Anderson



TRI-STATE ASPHALT CORPORATION

Road and Street Resurfacing Materials
EAST JEFFERSON STREET --- P.O. BOX 160
MARTINS FERRY, OHIO 43935

Plants:
Bellare, Ohio
Mingo Junction, Ohio
Arroyo, W.Va.
Moundsville, W.Va.
Wheeling, W.Va.
Weirton, W.Va.
Also
Modern Portable Plants



Martins Ferry, Ohio
614-633-2331

Wheeling Phones:
304-232-4242

December 24, 1981

West Virginia Air Pollution
Control Commission
1558 Washington Street, East
Charleston, WV 25311

RE: Permit or Consent Order
Arroyo, WV - Plant #300

Dear Sir:

Tri-State Asphalt Corporation possess a new, portable plant; and we are in the position to install this plant on any project of a large size, whenever and where ever in the Northern Panhandle we are the successful bidder. This will result in a lower volume of production for all Tri-State's other plants in the State of West Virginia -- essentially reducing them to a drugstore status. This new plant has been in operation in the State of Ohio for the 1981 calendar year and was successful in meeting this state's standards.

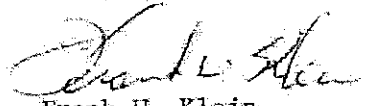
This year, we were faced with two hardships: the increased cost to meet the requirements of our Weirton Plant, and construction projects being down considerably over last year.

Tri-State Asphalt feels that it is fulfilling its commitment to control air pollution during the operation of its Arroyo Hot Mix Asphalt Plant by the use of its present system of a wet scrubber, which does not allow excessive emissions or particulate to be released into the atmosphere. Also, we plan to install one (1) reverse pulse fabric filter dust collector in 1983 on this plant.

In view of the above, Tri-State Asphalt Corporation hereby applies for a review by the Commission and a Consent Order or Permit to operate for the year, 1982.

Sincerely,

TRI-STATE ASPHALT CORPORATION



Frank W. Klein
Vice President

FWK/jmk



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
1558 Washington Street, East
CHARLESTON, WEST VIRGINIA 25311
TELEPHONE: 348-2275 OR 346-3286

May 7, 1982

Tri-State Asphalt
RD#1
Box 427 A
Rayland, Ohio, 43943

Gentlemen:

In accordance with Section 5 of Regulation III - "To Prevent and Control Air Pollution From the Operation of Hot Mix Asphalt Plants", enclosed is the 1982 Operating Permits for your asphalt hot mix plants.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Carl G. Beard, II", is written over a large, stylized, light-colored circular mark that resembles a large "C" or a flourish.

Carl G. Beard, II
Director

CGB,II:jbv

Enclosures

C
O
P
Y

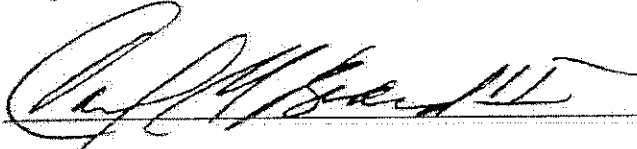
STATE OF WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION



OPERATING PERMIT
ASPHALT HOT MIX PLANT

PERMIT NO.: 1-82

THIS PERMIT IS ISSUED IN ACCORDANCE WITH CHAPTER 16, ARTICLE 20, CODE OF WEST VIRGINIA, ADMINISTRATIVE REGULATIONS, SERIES III, SECTION 5, AND IS SUBJECT TO THE CONDITIONS THEREOF.

Name of Company Tri-State Asphalt Corporation
Mailing Address East Jefferson Street, P.O. Box 160
Martins Ferry, Ohio 43935
Type of Plant Permanent - Batch
County Hancock
Description of Location Route 2, south of Chester, West Virginia,
one mile south of Waterford Race Track.
Remarks This permit is issued subject to an operat-
ing inspection during the 1982 operating
season.
Expiration Date January 1, 1983
Issued by: 
Title: Director
Date: May 7, 1982



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
1558 Washington Street, East
CHARLESTON, WEST VIRGINIA 25311
TELEPHONE: 348-2275 OR 348-3286

May 2, 1984

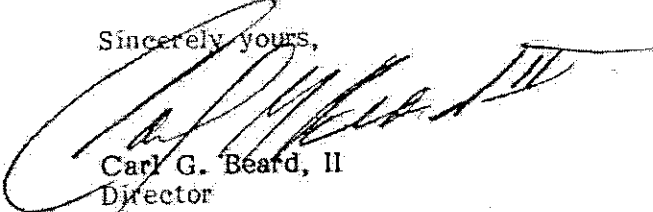
Mr. Glenn Straub
Tri-State Asphalt Corporation
P.O. Box 160
Martins Ferry, Ohio 43935

Dear Mr. Straub:

It has come to our attention that certain companies and firms are soliciting or making available for sale certain hazardous waste materials for use as an alternative fuel in bituminous asphalt plants. I am requesting that if you are considering using hazardous waste materials as an alternative fuel, that you notify this agency so that we may make a review as to whether or not you must apply for a modification permit pursuant to the regulations of this agency. Please advise the undersigned or Robert Weser, Chief of our Compliance Division.

I hope all the above is clear; however, if there are any questions, please call.

Sincerely yours,


Carl G. Beard, II
Director

CGB,II:jbv

cc: Mr. Robert Weser, Chief
Compliance Division, WVAPCC



Straub Enterprises, Inc.

P.O. BOX 160 MARTINS FERRY OH 43935

PHONE (614) 633-2331

September 5, 1984

RECEIVED
1984 SEP -6 PM 2:16
AIR POLLUTION
CONTROL COMMISSION

Air Pollution Control Commission
Charleston, WV

Sir:

Attached is our request to move our Barber Greene DM 66
asphalt plant to Rt 2 South of Newell Hancock Co., WV.

If there are any questions pertaining to this application
please contact me at 614-633-2331.

Thank you for your assistance.

Sincerely

Richard Smith
Vice President

RS/vc

Enc.

Bruce Morgan → Wheeling



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
1558 Washington Street, East
CHARLESTON, WEST VIRGINIA 25311
TELEPHONE: 348-2275 OR 348-3286

October 12, 1984

CERTIFIED MAIL

Mr. Richard Smith
Vice President
Straub Enterprises, Inc.
P. O. Box 70
Martins Ferry, Ohio 43935

Dear Mr. Smith:

Your application for a permit as required by Section 4 of Regulation XIII - "Permits for Construction, Modification, or Relocation of Stationary Sources of Air Pollutants, and Procedures for Registration and Evaluation" has been approved. The enclosed permit is hereby issued pursuant to Sub-Section 4.04 of Regulation XIII.

Sincerely yours,

A handwritten signature in cursive script that reads "Dale Farley".

Dale Farley
Chief, Engineering Division

DF/tm

Enclosure

STATE OF WEST VIRGINIA



Const. X
Mod.
Relo.

AIR POLLUTION CONTROL COMMISSION
PERMIT TO CONSTRUCT, MODIFY, OR RELOCATE
STATIONARY SOURCES OF AIR POLLUTANTS

024-00009

DATE: October 12, 1984 PERMIT NO. 767

This permit is issued in accordance with Chapter 16, Article 20, Code of West Virginia, Administrative Regulation, Series XIII, and is subject to the conditions thereof.

NAME OF PARENT COMPANY: Straub Enterprises, Inc.

PLANT NAME:

PLANT MAILING ADDRESS: P. O. Box 70

Martins Ferry, Ohio 43935

COUNTY: Hancock

DESCRIPTION OF EXACT LOCATION: On Route 2, three miles south of Newell,
West Virginia.

PERMIT FOR: Construction of a Barber Greene Model DM-66 portable asphalt plant
(300 TPH capacity).

SPECIAL CONDITIONS: NONE

ISSUED BY

[Signature]
DIRECTOR

Possession of this permit does not relieve any person of the responsibility of complying with any and all applicable rules or regulations of the Commission or any other governmental agency. The Director may cancel or suspend a permit if the plans and specifications upon which the approval was based are not adhered to.



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
1558 Washington Street, East
CHARLESTON, WEST VIRGINIA 25311
TELEPHONE: 348-2275 OR 348-3286

ENGINEERING EVALUATION
Straub Enterprises, Inc.
Newell, Hancock County

Application No. 767

I. Background

Straub Industries, Inc. has applied for a permit to construct an asphalt plant at Newell, West Virginia. The plant is currently in operation in Ohio, but has never been operated in West Virginia. The applicant plans to operate the new plant adjacent to an existing plant that is not currently in operation.

II. Description

The portable plant is a Barber Greene Model DM-66, with a capacity of 300 TPH. The dryer uses #2 grade fuel oil having a heating value of 120,000 Btu/gal and a maximum sulfur content of 0.20%. The dryer is vented to a Barber Greene Model CE340L273 baghouse with a guaranteed collection efficiency of 99.9%. The collected material is returned to the dryer and incorporated in the mix. Stack data for the baghouse is as follows: 3 ft. diameter, 19 ft. high, 52,000 ACFM, and 300° F.

Points of fugitive emissions include stockpiles, haulways, and conveyors. Dust suppression for stockpiles is maintained by water.

A projected operating schedule for the plant is 8 hrs/day, 5 days/wk, and a total of approximately 7 days.

III. Evaluation

Straub Industries, Inc. estimates a potential of 2229 lb/hr particulate emissions from the drier, and 3 lb/hr actual emissions from the baghouse stack. WVAPCC Regulation III states allowable emissions as 50 lb/hr and limits opacity to 20%. USEPA New Source Performance Standards, promulgated March 8, 1974, limits particulate emissions to 0.004 gr/dscf and also limits opacity to 20%.

IV. Recommendation

Straub Industries, Inc. has proposed emissions estimates that are clearly within compliance of applicable regulations. With the information provided for my review of the proposed project, I recommend the West Virginia Air Pollution Control Commission approve Permit Application No. 767.

Jeffrey S. Craddock
Jeffrey S. Craddock
Engineer I

10/11/84

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Wheeling Office
303 Methodist Bldg., 11th & Chapline Streets
Wheeling, West Virginia 26003

SUBJECT: Air Compliance Inspection Report

DATE: December 3, 1980

FROM: Richard W. Eaton (3ES32) *RWE*
Environmental Protection Specialist

TO: Len Mangiaracina (3ES00)
Deputy Director, Environmental Services Division

THRU: Gary V. Bryant (3ES32) *GVB*
Chief, Wheeling Field Section

FILE	Tri-State Asphalt
COMPANY	Tri-State Asphalt
LOCATION	Wheeling, WV
REGION	III

Attached is a copy of the Air Compliance Inspection report on

Tri-State Asphalt Corporation, Newell, WV

for your review. If you have any questions, please call.

Permanently Closed

REGION III, U.S. ENVIRONMENTAL PROTECTION AGENCY
Wheeling, Field Section, Wheeling, WV.
Air Compliance Inspection Report

I. GENERAL INFORMATION

Company Name: Tri-State Asphalt Corporation

Address: Route 2

(City): Newell (County) Hancock (State) WV

Form of Ownership Corporate CDS# _____

Date(s) of Inspection November 12, 1986

Arrival Time: 11:00 AM Departure Time: 11:30 AM

Company Personnel: Frank Kline (via telephone)

State Personnel: Judy Tredway, WVAPCC

EPA Personnel: Richard W. Eaton, Wheeling Field Section

Type of Inspection: Level III

II. TYPE OF FACILITY (Including production rates, employees, etc):

The Tri-State Asphalt Corporation Plant at Newell, West Virginia consists of a Barber-Greene drum mix asphalt kiln with two twin storage silos. After arriving at the facility the EPA and West Virginia state inspectors discovered that the facility had been closed on a permanent basis. No company personnel are located at the facility in Newell, West Virginia.

A telephone conversation was held with Frank Kline of the corporate office of Tri-State Asphalt in Martins Ferry, Ohio after returning from the Newell, West Virginia facility. Mr. Kline indicated that the Newell plant had been sold and portions of the equipment will be moved to other locations. The plant has not been operated since June 1985.

COMPLIANCE STATUS
TRI-STATE ASPHALT CORPORATION
NEWELL, WEST VIRGINIA
NOVEMBER 12, 1986

III. COMPLIANCE STATUS

Plant is permanently closed.

CONCLUSIONS AND RECOMMENDATIONS
TRI-STATE ASPHALT CORPORATION
NEWELL, WEST VIRGINIA
NOVEMBER 12, 1986

IV. CONCLUSIONS AND RECOMMENDATIONS

1. This facility should be removed from the regional inspection list.
2. A copy of this report should be forwarded to Ray Chalmers of the Air Enforcement Branch.



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
NORTHERN PANHANDLE REGIONAL OFFICE
1911 Worwood Avenue
WHEELING, WEST VIRGINIA 26003
Telephone: 304-277-2662

MEMORANDUM FOR RECORD

TO: Bruce E. Morgan
Acting Regional Engineer

DATE: December 12, 1986


FROM: Judith L. Tredway
Air Pollution Specialist II

SUBJECT: TRI-STATE ASPHALT CORP. - ARROYO
EPA Inspection

FILE: Tri-State Asphalt
Arroyo Plant
Regulation III

On Wednesday, November 12, 1986, the writer accompanied Richard Eaton of the US/EPA Wheeling Field Office whose purpose was to conduct a general inspection of the subject asphalt Plant. The Plant, as expected, was not operating.

This Facility has been operated on a very limited, sporadic basis over the last 4 or 5 years. In 1985, a newly purchased, Barbour-Greene portable plant (nearly identical to Tri-State's Weirton Plant) was moved on-site along side the old Plant/Facilities. The new Plant was never operated at that location, however, and has since been removed to a site in the state of Ohio. According to Tri-State management personnel, future use/disposition of the Arroyo Plant/site is uncertain at this time.


Judith L. Tredway
Air Pollution Specialist II

JLT/gag
cc: C. G. Beard, II



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
NORTHERN PANHANDLE REGIONAL OFFICE
1911 Warwood Avenue
WHEELING, WEST VIRGINIA 26003
Telephone: 304-277-2662

RECEIVED
JUN 1 1988
AIR POLLUTION CONTROL COMMISSION
NORTHERN PANHANDLE REGIONAL OFFICE

MEMORANDUM FOR RECORD

TO: Judith L. Tredway
Regional Engineer

DATE: June 1, 1988

FROM: Tim J. Carroll
Air Pollution Specialist

SOURCE STATUS CODE 41

SUBJECT: TRI-STATE ASPHALT
Arroyo Plant

FILE: Tri-State Asphalt
Arroyo Plant
Regulation III

While conducting inspections in the Newell area on Tuesday, May 24, 1988 the writer drove by the subject facility.

A cursory observation indicated that this plant had not been operated in quite some time as evidenced by the "run-down" appearance of the plant and surrounding grounds.

In a phone conversation with Frank Kline, Supt. of Plants, on Wednesday, May 25, 1988 Mr. Kline indicated that the unit is available for production if needed but had not operated since 1986 and was in fact for sale.

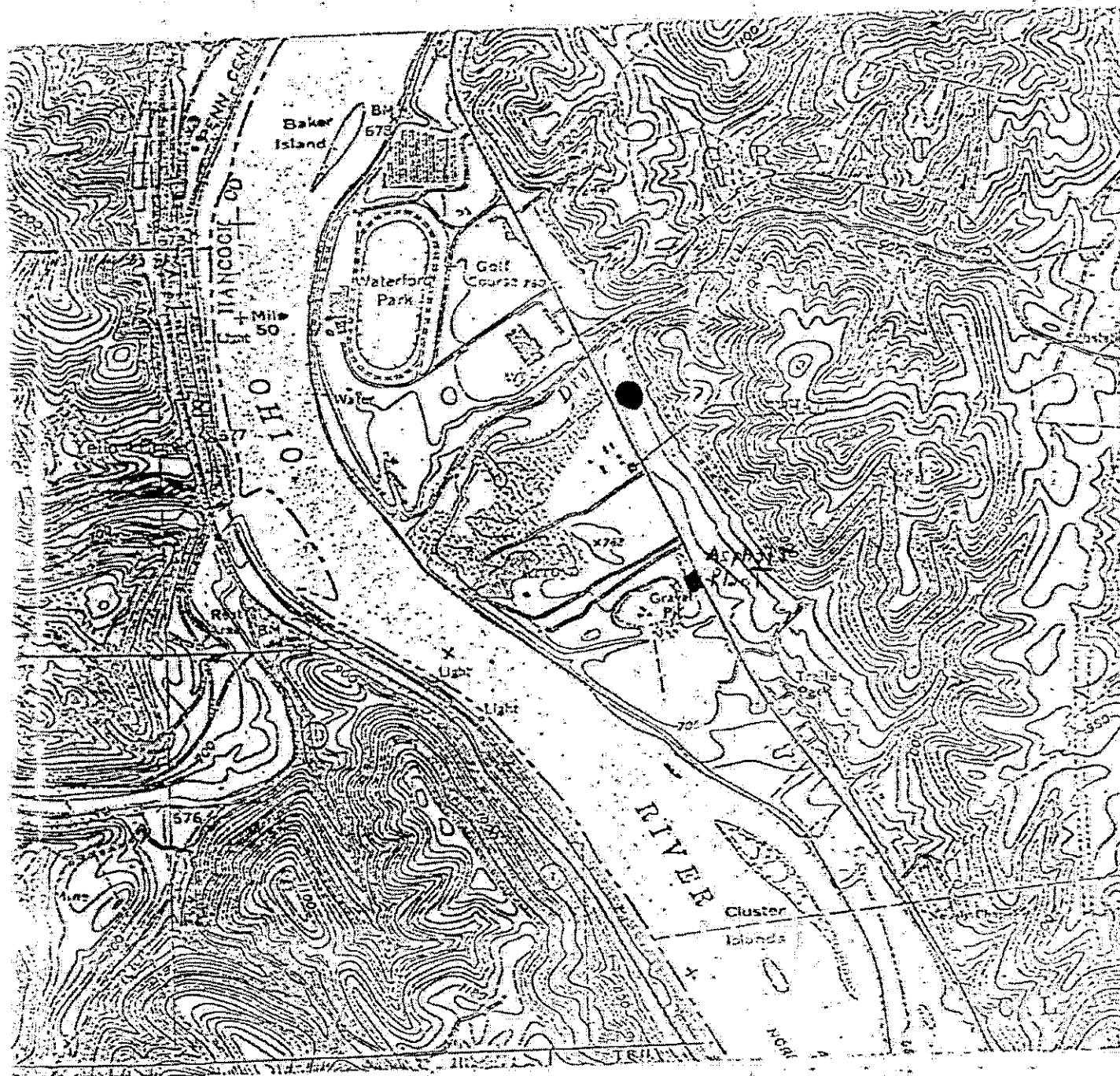
The writer informed Mr. Kline that this office should be contacted if and when the plant would be utilized for a production run so that it could be properly inspected. Mr. Kline was also asked to contact NPRO in the event of sale of the unit for information concerning regulated permit processing.

Because this plant is not operational, compliance status cannot be determined at this time.

Follow-up inspections will be performed dependent on the conditions cited above.


Tim J. Carroll
Air Pollution Specialist

TJC/gag



WELLSVILLE QUADRANGLE; OHIO - WEST VIRGINIA

7.5 Minute Series (Topographic)

HL030 - W8037.5/7.5

1960

Photo Revised 1971

AMS 4865 II SW - Series V852

ATTACHMENT 2
GROUNDWATER QUALITY TABLE

ATTACHMENT 3
HISTORIC AERIAL PHOTOGRAPHS



www.historicalinfo.com



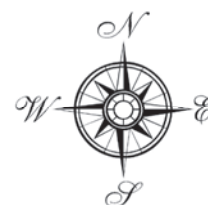
Deltech Corp
7743 Ohio River Boulevard
New Cumberland, WV

2009

HIG Project Number: MBB-1286

Client Project Number:

Approximate Scale 1:6000 (1"=500')





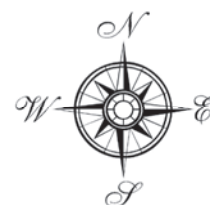
Deltech Corp
7743 Ohio River Boulevard
New Cumberland, WV

2004

HIG Project Number: MBB-1286

Client Project Number:

Approximate Scale 1:6000 (1"=500')





www.historicalinfo.com



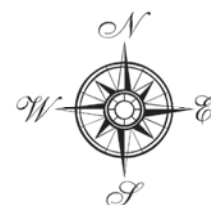
Deltech Corp
7743 Ohio River Boulevard
New Cumberland, WV

1997

HIG Project Number: MBB-1286

Client Project Number:

Approximate Scale 1:6000 (1"=500')





www.historicalinfo.com



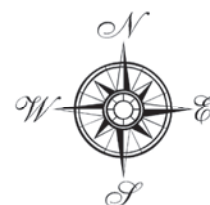
Deltech Corp
7743 Ohio River Boulevard
New Cumberland, WV

1994

HIG Project Number: MBB-1286

Client Project Number:

Approximate Scale 1:6000 (1"=500')





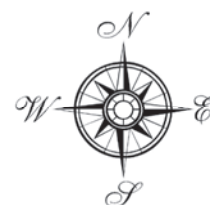
Deltech Corp
7743 Ohio River Boulevard
New Cumberland, WV

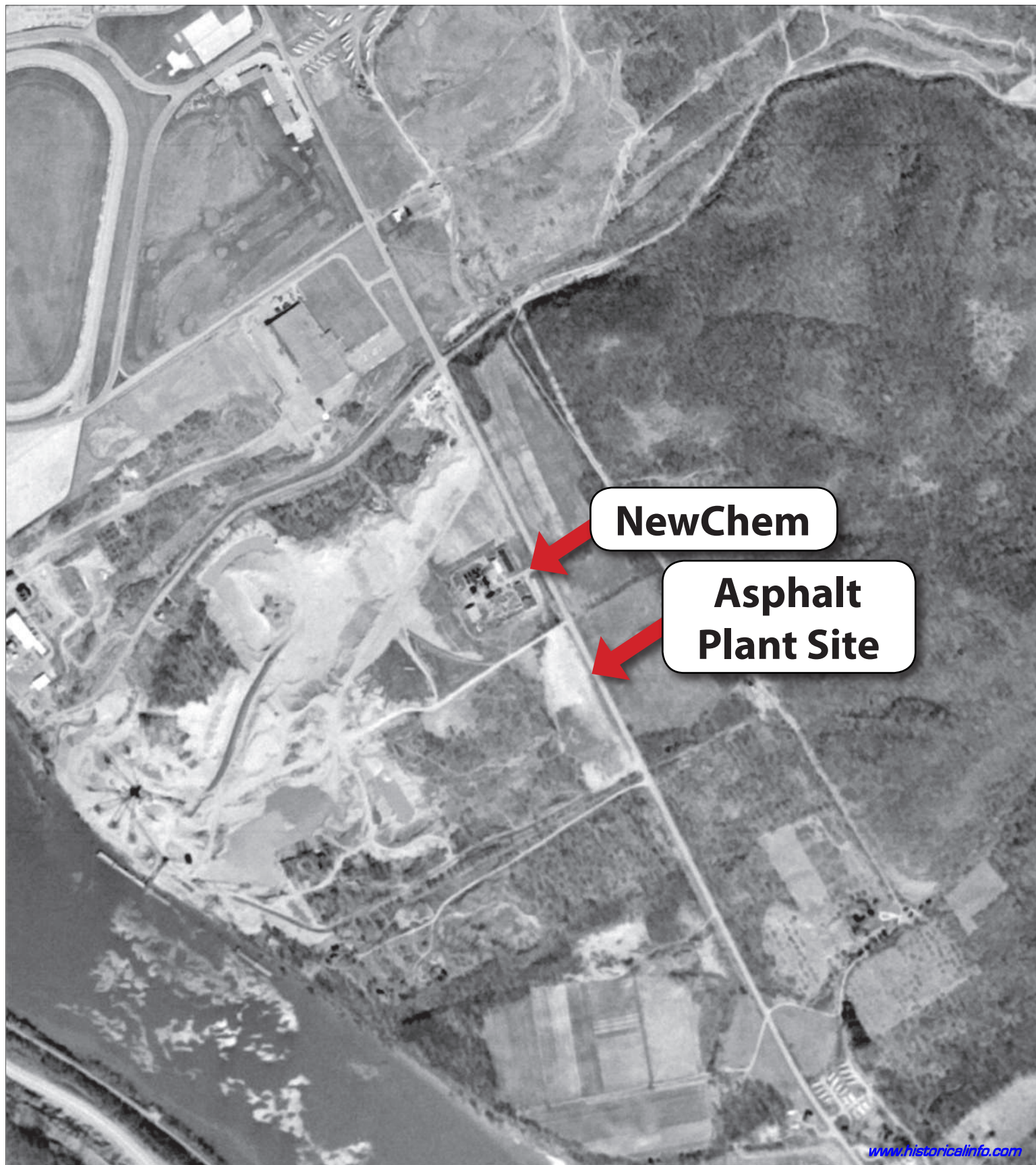
1982

HIG Project Number: MBB-1286

Client Project Number:

Approximate Scale 1:6000 (1"=500')





www.historicalinfo.com



Deltech Corp
7743 Ohio River Boulevard
New Cumberland, WV

1971

HIG Project Number: MBB-1286

Client Project Number:

Approximate Scale 1:9600 (1"=800')





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Deltech Corp
7743 Ohio River Boulevard
New Cumberland, WV

1954

HIG Project Number: MBB-1286

Client Project Number:

Approximate Scale 1:9600 (1"=800')

